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15	Kingsbury, and Darren Uyenoyama		
16	[Additional Counsel Listed on Signature Page]		
17	IN THE UNITED STA	TEC DICTE	ICT COURT
18	FOR THE NORTHERN D		
19			
20	Cung Le, Nathan Quarry, and Jon Fitch, on	Case Nos 5	:14-cv-05484-EJD; 5:14-cv-
21	behalf of themselves and all others similarly situated,	05591-EJD;	5:14-cv-05621-EJD; 5:15-cv- 5:15-cv-01324-EJD
22	Plaintiffs,	,	
23	v.		ION EXTENDING BRIEFING E FOR DEFENDANT'S
24	Zuffa, LLC, d/b/a Ultimate Fighting	MOTION T	O STAY DISCOVERY
25	Championship and UFC,	Date:	September 10, 2015
26	Defendant.	Time: Courtroom:	9:00 a.m. 4
27		Judge:	Hon. Edward J. Davila
28			5:14-cv-05484-EJD, 5:14-cv-05591-EJD 5:14-cv-05621-EJD, 5:15-cv-00521-EJD 5:15-cv-01324-EJD

STIPULATION AND [PROPOSED] ORDER EXTENDING BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO STAY DISCOVERY

1 2	Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,
3	Plaintiffs,
4	v.
5	Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,
6	Defendant.
7	
8	Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,
9	Plaintiffs,
10	v.
11	Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,
12	
13	Defendant.
14	Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,
15	Plaintiffs,
16	v.
17	Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,
18	
19	Defendant.
20	Kyle Kingsbury and Darren Uyenoyama, on
21	behalf of themselves and all others similarly situated,
22	Plaintiffs,
23	v.
24	Zuffa, LLC, d/b/a Ultimate Fighting
25	Championship and UFC,
26	Defendant.
27	

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5:14-cv-05484-EJD, 5:14-cv-05591-EJD 5:14-cv-05621-EJD, 5:15-cv-00521-EJD 5:15-cv-01324-EJD Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez, Dennis Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama (collectively, "Plaintiffs") and Defendant Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC ("Defendant"), pursuant to Civil Local Rule 6-2, request that the Court enter the parties' stipulation below extending the time for Plaintiffs to respond to the Defendant's Motion to Stay Discovery (the "Stipulation").

### **FACTS UNDERLYING THE PARTIES' STIPULATION**

In support of their Stipulation, the parties offer the following facts:

- A. Between December 16, 2014 and April 2, 2015, Plaintiffs filed five related class actions against Defendant.
- B. On January 15, 2015, the parties stipulated that Defendant would respond to Plaintiffs' Complaints by February 27, 2015.
- C. On January 30, 2015, Defendant filed a Motion to Transfer Venue to the District of Nevada. This Motion is fully briefed and was argued and submitted on May 7, 2015.
- D. On February 27, 2015, Defendant filed a Motion to Dismiss. This Motion is fully briefed. The hearing on the motion is set for July 23, 2015.
- E. On May 13, 2015, Defendant filed a Motion to Stay Discovery pending the Court's decisions on Defendant's Motion to Dismiss and its Motion to Transfer Venue.
- F. Pursuant to Civil Local Rule 7-3(a), Plaintiffs' Opposition to Defendant's Motion to Stay is due on May 27, 2015.
- G. The parties agree that party and judicial efficiency would be best served by permitting Plaintiffs to have an extension to file their Opposition to Defendant's Motion to Stay Discovery and a concomitant extension for the Defendant to file its Reply brief.
- H. No previous extension has been sought as to this motion. This extension does not affect the noticed hearing date or any other proceeding on the Court's calendar.

### **STIPULATION**

In light of the above facts, the parties jointly request that the Court enter the following Stipulation as the Order of the Court.

- 1				
1	1. Plaintiffs shall file their Opposition to Defendant's Motion to Stay Discovery on or			
2	before June 3, 2015. The brief shall not exceed 25 pages.			
3	2. Defendant shall file its Reply on or before June 17, 2015. The brief shall not exceed 15			
4	pages.			
5	3. Nothing in this Stipulation precludes Plaintiffs or Defendant from seeking to amend the			
6	filing deadlines set forth herein as permitted under the Local Rules if circumstances warrant.			
7	IT IS SO STIPULATED.			
8	DATED: May 22, 2015			
9	ACCEPTAGAMENTA ANARYDIA DAG			
10	JOSEPH SAVERI LAW FIRM, INC.			
11	By: <u>/s/ Joseph R. Saveri</u> Joseph R. Saveri			
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# Case 2:15-cv-01056-RFB-PAL Document 59 Filed 05/26/15 Page 6 of 8

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5	DJC@campbellandwilliams.com JCW@campbellandwilliams.com				
6	Attorneys for Defendant Zuffa, LLC, d/b/a Ultimate				
7	Fighting Championship and UFC				
8					
9	Pursuant to Local Rule 5.1(i)(3), I attest that all of the above signatories listed, and on whose behalf the				
10	filing is submitted, concur in the filing's content and have authorized the filing.				
11					
12	Dated: May 22, 2015  By: <u>/s/ Joseph R. Saveri</u> Joseph R. Saveri				
13	Joseph R. Saven				
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1			[PROPOSED] ORDE	CR
2	PURSUAN	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
3	Dated:	5/26/2015	By:	EOLO Dal
4				Honorable Edward J. Davila United States District Judge
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